

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

TravelPass Group, LLC, Partner Fusion, Inc.,
Reservation Counter, LLC,

Plaintiffs,

v.

Caesars Entertainment Corporation, Choice
Hotels International, Inc., Hilton Domestic
Operating Company Inc., Hyatt Hotels
Corporation, Marriott International, Inc., Red
Roof Inns, Inc., Six Continents Hotels, Inc.,
Wyndham Hotel Group, LLC,

Defendants.

Case No. 5:18-cv-153-RWS-CMC

JURY TRIAL DEMANDED

DEFENDANT MARRIOTT'S UNOPPOSED MOTION TO FILE UNDER SEAL

Defendant Marriott International, Inc. ("Marriott") submits this Unopposed Motion to File Under Seal its Objections to the Report and Recommendation (Dkt. No. 711) ("Objections"). Marriott's Objections contains information the parties designate as "Confidential" or "Highly Confidential" under the Amended Protective Order (Dkt. No. 288) entered in this case.

Counsel for Marriott conferred with TravelPass about this motion to seal, and has confirmed that TravelPass does not oppose the relief sought by this motion. As such, Marriott respectfully requests the Court enter an order sealing their Objections.

Respectfully submitted,

/s/ Jennifer H. Doan

Jennifer H. Doan
Texas Bar No. 08809050
Cole A. Riddell
Texas Bar No. 24105423
HALTOM & DOAN
6500 Summerhill Rd., Suite 100
Texarkana, TX 75503
Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: criddell@haltondoan.com

Shari Ross Lahlou
Dechert LLP
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 261-3300
Facsimile: (202) 261-3333
Email: shari.lahlou@dechert.com

Jeffrey L. Poston
David Ervin
Britton D. Davis
Crowell & Moring LLP
1001 Pennsylvania Ave., NW
Washington, DC 20004
Telephone: (202) 624-2500
Facsimile: (202) 624-5116
Email: JPoston@crowell.com
Email: DErvin@crowell.com
Email: BDavis@crowell.com

Jordan Ludwig
Crowell & Moring LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: (213) 622-4750
Facsimile: (213) 622-2690
Email: JLudwig@crowell.com

**ATTORNEYS FOR DEFENDANT
MARRIOTT INTERNATIONAL, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service, on this 20th day of October, 2021.

/s/ Jennifer H. Doan

Jennifer H. Doan

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiffs and Defendant met and conferred in compliance with Local Rule CV-7(h). Plaintiffs are unopposed to Defendant's requested relief.

/s/ Cole A. Riddell

Cole A. Riddell